

EUROPE'S TOXIC-FREE CHOICE

Actions for a more circular and resilient economy, better quality of life and hope for our youth under the 2024 - 2029 legislative mandate

The European Union stands at a pivotal moment to shape a future where prosperity, public health, social justice, and a resource-preserving as well as climate-friendly economy coexist.

Despite advancements in health, climate and environmental policies, the pervasive threat of pollution from hazardous chemicals presents a stark challenge threatening our [survival](#) and the Earth's stability. Found in our water, food, air, and everyday products, these inescapable chemicals compromise our health, causing illness like cancer, infertility, cognitive impairment, and premature death, with disproportionate impacts on vulnerable persons including women and children, and future generations. Europeans are already highly [contaminated](#). Chemical pollution is a profound health crisis infringing on the fundamental human right to a clean, healthy and sustainable environment.

As we look towards the 2024-2029 mandate, the EU must commit to a toxic-free and socially just green transition and support the European industry in leading the way in the innovation of clean and non-toxic chemicals, products, and practices. We owe it to future generations to champion solutions for the climate, the biodiversity, and the chemical pollution crises.

To attain these objectives, the first unavoidable step is for the European Commission to fully deliver on the Chemicals Strategy for Sustainability and maintain a high level of ambition in its implementation.

The EU must implement a 'One Planet, One Health' holistic approach that prioritises access to clean sustenance, promotes agroecology, and transitions away from highly hazardous pesticides. This approach will complement efforts to reduce carbon emissions and strategies to eliminate toxic chemicals in consumer products by 2030.

Policymakers must prioritise the following critical areas:

1. Update REACH to accelerate the identification and phase-out of harmful chemicals

REACH, the existing chemicals control system, must be reformed. On average it takes over [19 years to regulate](#) a harmful chemical, while many other chemicals continue to be placed on the market despite unknown properties, including the building blocks for plastics, known as polymers. The system lags behind scientific consensus, with central information requirements missing and most harmful chemicals like PFAS, bisphenols, halogenated flame retardants, and PVC remaining on the market. **A swift reform of the current system is necessary to effectively protect citizens and the environment. Only chemicals for which complete and adequate safety data are provided should be placed on the market and the restriction of the most harmful chemicals by groups, such as carcinogens, reprotoxins, persistent chemicals and endocrine disruptors, must be accelerated.**

To achieve this, updates of REACH are needed to:

- Introduce fast-track restrictions for the [most harmful chemicals](#) in all consumer and professional products;
- Simplify and reduce the burden of Restriction and Authorisation processes for authorities;
- Improve registration requirements, including for polymers, endocrine disruptors, persistent, bioaccumulative and mobile chemicals and carcinogens.

2. Deal with the ever-growing PFAS pollution to sustain our quality of life: food security, water and nature

The [Forever Pollution project](#) recently revealed EU-wide PFAS contamination of drinking water, food and soil. At the same time, the Human Biomonitoring Initiative [found](#) “widespread exposure to PFAS which exceeds health-based guidance values” among the European population. The European Environment Agency recognises that these substances – ubiquitous in consumer products – “can lead to health problems such as liver damage, thyroid disease, obesity, fertility issues and cancer”. Addressing PFAS contamination is now our responsibility. **To protect future generations from ‘forever’ chemicals, we must close the tap and phase out PFAS manufacture, use, and emissions at all relevant sources, except for those rare uses deemed essential for society for which no substitutes exist yet.**

To achieve food security, and water and nature protection, the EU should:

- Adopt an ambitious universal PFAS restriction within the legal deadlines;
- Complete the Chemicals Strategy’s PFAS Action plan;
- Restrict PFAS in all relevant legislation, such as Cosmetics and Food Contact Materials.

3. Achieve a more circular and resilient economy by enhancing transparency and traceability of chemicals and delivering toxic-free products by 2030

The presence of harmful chemicals in products is a significant barrier to achieving a circular economy by contaminating material cycles. **To enable the transition to a circular and more resilient EU economy, it will be crucial to restrict the use of all the most harmful chemicals in consumer products by 2030** through a more effective REACH and products’ policy framework.

Moreover, lack of knowledge and understanding of chemicals used in production processes and present in products hamper authorities’ capacities to regulate chemicals and prevents innovation. The Commission, together with the Member States, must create regulatory incentives aimed at ensuring transparency and traceability. With enhanced chemical transparency, companies can design out toxic chemicals from their products, and new business models can thrive.

To achieve a Clean Circular Economy, the EU should:

- Introduce a target and adopt an ambitious roadmap for toxic free products by 2030 to ban the most harmful chemicals in everyday products through REACH, Ecodesign and /or other relevant product legislation;
- Under ESPR implementation, dynamic reporting obligations concerning all substances of concern (SoC) must be the norm;
- Create under the Common Platform for Data on Chemicals a service integrating all existing chemicals in products data under Union legislation, and take immediate action to close any data gaps;
- Industries must be supported in building capacities and establishing cross-sector harmonised reporting approaches.

4. Hasten Research and Innovation towards clean and toxic-free industries

A truly green transition is not possible with the use of toxic, polluting chemicals such as PFAS. In addition, the transition to safe and sustainable chemicals, from production to end of life, is a tremendous economic opportunity for the EU chemical industry to re-enforce competitiveness and reach climate neutrality. **Member States should, therefore, commit to stopping the production of hazardous chemicals, materials and products**, regardless of feedstock.

To boost safe and green innovation, the EU should:

- Develop and implement economic instruments to support safe, sustainable, climate-neutral chemicals, materials and technologies;
- Work proactively to drive substitution to support downstream users, especially SMEs.

5. Put citizens at the heart of our democracy by strengthening access to justice and accountability

The legal system must provide citizens and regions affected by chemical pollution with effective access to justice: authorities must **scrutinise all evidence of chemical exposure submitted by citizens** and their representatives, and **effective compensation mechanisms, such as damage funds**, are needed in the

event of harm. **Companies whose products and production processes are responsible for must be held accountable** to prevent the costs of disease and pollution from being passed on to society.

Harmonised, dissuasive, and effective sanctions and comprehensive enforcement measures are required to prevent the current high levels of non-compliance with chemicals legislation.

To strengthen access to justice and accountability, the EU should:

- Introduce and implement the polluter pays principle as part of the REACH revision by introducing harmonised access to justice mechanisms and establishing explicit legal requirements, such as imposing additional fees to registrants and users of substances of very high concern.
- Harmonise strong and dissuasive enforcement obligations at EU level.

6. Put halting exports of EU-banned chemicals at the centre of the new economic foreign policy

EU Member States produce and export domestically banned and severely restricted hazardous chemicals to countries with less stringent regulations. In 2018 and 2019, for instance, the United Kingdom and EU countries [approved](#) the export of 140,908 tonnes of EU-banned pesticides. **The EU must lead globally by ending this practice of unethical double standards.**

To stop double standards, the EU should meet the CSS promise to “lead by example, and, in line with international commitments, ensure that hazardous chemicals banned in the European Union are not produced for export, including by amending relevant legislation if and as needed.”

Guiding principles for EU chemicals policy

It is now our generation’s duty to shape future strategies that are integrated and guided by human rights principles. The EU must rigorously implement Article 191(1) of the Treaty on the Functioning of the EU, in particular: the *“Union policy on the environment shall aim at a high level of protection **taking into account the diversity of situations in the various regions** of the Union. It shall be based on the **precautionary principle** and on the principles that **preventive action should be taken, that environmental damage should as a priority be rectified at source** and that **the polluter should pay.**”* Policymakers should pay specific attention to:

- **Upholding human rights throughout all EU chemicals policies.** Complying with international and European legally binding frameworks should be a compass for decision making on chemical safety. The institutions should always take into account the impacts of hazardous chemicals on the enjoyment of human rights, including, but not limited to, the right to health, bodily integrity, non-discrimination and consumer protection. **Corporate accountability, in line with the Polluter Pays principle**, by implementing an Extended Producer Responsibility and ensuring that the financial burden related to pollution is placed on polluting companies.
- **Making the regulatory framework inclusive and transparent**, implementing the right to know, including citizens’ voices and concerns during the decision-making process, and ensuring that corporate interests are not favoured at the expense of health and environmental protection.
- **Recognising the different vulnerabilities of people and groups of people to hazardous substances**, taking into account factors such as their area of residence, occupation, social and economic status, age, and gender. People are affected differently by harmful chemicals due to factors such as gender, socio-economic status, and other intersectional aspects. These disparities must be integrated into chemical policies, programs, toxicology studies, and protective measures.
- **Adopting the “One Planet, One Health” concept**, ensuring that decarbonization and detoxification go hand in hand and that a specific environmental legislation does not undermine any of the environmental objectives. For instance, a technology that would support the energy transition should not be detrimental to people’s and nature’s health.

For a successful green transition, the EU should adopt a more holistic concept of sustainability—one that equally incorporates environmental, economic, and social dimensions and specifically addresses gender, social, and intersectional justice within chemical policy.